CARRIERS—RATE REGULATION—RIGHT TO COMPEL RAILROAD COMMISSION TO RAISE STREET CAR FARE.—The Jacksonville Traction Company was unable to operate its street car service under an existing five-cent franchise granted by the city, without a large deficit. The receiver asked for mandamus to force the State Railroad Commission to fix a reasonable rate. *Held,* the state has power to reduce or increase fares, which power is not affected by the city ordinance. This power may be exerted through the Railroad Commissioners and mandamus may properly issue to compel their action. *State ex. rel. Triay* v. *Burr* (Fla., 1920), 84 So. 61.

For discussion of the question involved, see 18 MICH. L. REV. 320.

CONSTITUTIONAL LAW—ADMIRALTY—STATE WORKMEN'S COMPENSATION ACTS—POWER OF CONGRESS.—The JUDICIAL CODE of the United States (Clause 3, Secs. 24 and 256) provides that United States District Courts are granted "exclusive original cognizance of all civil causes of admiralty and maritime jurisdiction, saving to suitors, in all cases, the right of a common law remedy, where the common law is competent to give it, *and to claimants the rights and remedies under the Workmen's Compensation Law of any State.*" Pursuant to this provision, the New York courts granted an award under the Compensation Law of that state to the family of a bargeman drowned in Hudson River (226 N. Y. 302). On error in the United States Supreme Court, *held* (Holmes, Pitney, Clarke, and Brandeis, JJ., dissenting) the award improper. Congress had no power to provide for the application of State Workmen's Compensation Acts to employees engaged in service within the jurisdiction of admiralty. *Knickerbocker Ice Co.* v. *Stewart* (May 17, 1920), —— U. S. ——.

The words of the JUDICIAL CODE above in italics were added by Congress in 1917 to take care of the situation as left by the decision in *Southern Pacific Co.* v. *Jenson* (May, 1917), 244 U. S. 205, where it was declared that "Congress has paramount power to fix and determine the maritime law which shall prevail throughout the country," and that, "when applied to maritime injuries, the New York Workmen's Compensation Law conflicts with the rules adopted by the Constitution, and to that extent is invalid." It was further held that the saving clause had no application. Discussing the *Jensen* case, see 15 MICH. L. REV. 657; 17 COL. L. REV. 703; 31 HARV. L. REV. 488; 6 CAL. L. REV. 69; 2 SOUTH. L. QUART. 304; 27 YALE L. JOUR. 255. The principal case now holds that not even Congress can provide for the application of State Workmen's Compensation Laws to maritime injuries. In *Sudden & Christensen* v. *Ind. Acc. Comm.* (April 12, 1920), 188 Pac. 803, the Supreme Court of California had held the same way. On the general subject the Constitution provides simply that "The judicial power shall extend to * * * all cases of admiralty and maritime jurisdiction." (Sec. 2, Art III.) That "Congress has paramount power to fix and determine the maritime law which shall prevail throughout the country" was conceded even by the majority in the *Jensen* case. The principal case must stand, then, on the ground that Congress had gone too far. But on what basis can the court